

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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	:	
In re:	:	Chapter 11
	:	
VIRGIN ORBIT HOLDINGS, INC., <i>et al.</i> , ¹	:	Case No. 23-10405 (KBO)
	:	
Debtors.	:	(Jointly Administered)
	:	
	:	Ref. Docket Nos. 463 & 532

NOTICE OF FILING OF REVISED EXHIBIT E TO THE PLAN SUPPLEMENT

PLEASE TAKE NOTICE that, on June 20, 2023, the above-captioned debtors and debtors in possession (the “**Debtors**”) filed the *Third Amended Joint Chapter 11 Plan of Virgin Orbit Holdings, Inc. and Its Debtor Affiliates Under Chapter 11 of the Bankruptcy Code* [Docket No. 463] (as may be amended, supplemented, or modified from time to time, the “**Plan**”).²

PLEASE TAKE FURTHER NOTICE that, on July 14, 2023, the Debtors filed the *Notice of Filing of Plan Supplement* [Docket No. 532] (the “**Plan Supplement**”). The Debtor reserved its right to amend, revise, or supplement the Plan Supplement.

PLEASE TAKE FURTHER NOTICE that the Debtor has revised Exhibit E to the Plan Supplement, which is attached hereto as **Exhibit A**. A blackline showing the changes to Exhibit E is attached hereto as **Exhibit B**.

PLEASE TAKE FURTHER NOTICE that copies of the Plan and the Plan Supplement may be obtained upon request of the undersigned counsel for the Debtors at the address specified below, and are on file with the Clerk of the Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, where they are available for review between the hours of 8:00 a.m. to 4:00 p.m. (ET). The Plan and the Plan Supplement are also available for inspection on the Bankruptcy Court’s website at <https://pacer.uscourts.gov>, or free of charge on the website of the Debtors’ claims and noticing agent, Kroll Restructuring Administration LLC, dedicated to these chapter 11 cases, www.cases.ra.kroll.com/virginorbit/.

PLEASE TAKE FURTHER NOTICE that subject to the terms and conditions of the Plan, the Debtors reserve all rights to amend, revise, or supplement the Plan Supplement, and any

¹ The Debtors in these cases, along with the last four digits of each debtor’s federal tax identification number, are: Virgin Orbit Holdings, Inc. (6914); Virgin Orbit National Systems, LLC (3801); Vieco USA, Inc. (0492); Virgin Orbit, LLC (9648); and JACM Holdings, Inc. (1445). The Debtors’ mailing address for purposes of these cases is 3880 McGowen Street, Long Beach, CA 90808.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Plan.

of the documents and designations contained herein, at any time before the Effective Date of the Plan, or any such other date as may be provided for by the Plan or by order of the Bankruptcy Court.

Dated: July 18, 2023
Wilmington, Delaware

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Counsel for Debtors and Debtors in Possession

EXHIBIT A

Revised Exhibit

Exhibit E

Identity and Terms of Compensation and Litigation Trustee and Litigation Trust Oversight Committee

The Litigation Trustee (as defined in the Plan) will be Matthew Dundon. Pursuant to Section 2.5 of the Litigation Trust Agreement, the Litigation Trustee shall be compensated on a monthly basis at \$7,500 per month, payable solely from the Litigation Trust Assets. The Litigation Trustee will also be entitled to reimbursement of actual and necessary out-of-pocket expenses incurred.

The Litigation Trust Oversight Committee will be comprised of Arqit Limited, Barber-Nichols LLC and James Cahillane. Pursuant to Section 7.4 of the Litigation Trust Agreement, the members of the Litigation Trust Oversight Committee shall not be entitled to compensation in connection with their service to the Litigation Trust Oversight Committee.

EXHIBIT B

Blackline

Exhibit E

Identity and Terms of Compensation and Litigation Trustee and Litigation Trust Oversight Committee

The ~~Liquidation~~Litigation Trustee (as defined in the Plan) will be Matthew Dundon. Pursuant to Section 2.5 of the Litigation Trust Agreement, the Litigation Trustee shall be compensated on a monthly basis at \$7,500 per month, payable solely from the Litigation Trust Assets. The Litigation Trustee will also be entitled to reimbursement of actual and necessary out-of-pocket expenses incurred.

The Litigation Trust Oversight Committee will be comprised of ~~---~~Arqit Limited, Barber-Nichols LLC and James Cahillane. Pursuant to Section 7.4 of the Litigation Trust Agreement, the members of the Litigation Trust Oversight Committee shall not be entitled to compensation in connection with their service to the Litigation Trust Oversight Committee.